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6 Attorneys for Plaintiffs

7
8 IN THE UNITED STATES DISTRICT COURT

9 FOR THE NORTHERN DISTRICT OF CALIFORNIA

10 SERVICE EMPLOYEES INTERNATIONAL
UNION NATIONAL INDUSTRY PENSION
11 FUND; STEPHEN ABRECHT, Trustee;
RODERICK S. BASHIR, Trustee; KEVIN J.
12 DOYLE, Trustee; DAVID A. STILWELL,
Trustee; STEVEN W. FORD, Trustee;
13 LARRY T. SMITH, Trustee; FRANK A.
MAXSON, Trustee; EDWARD MANKO,
14 Trustee; JOHN J. SHERIDAN, Trustee; and
MYRIAM ESCAMILLA, Trustee,
15 Plaintiffs,

16 vs.

17 U.S. METRO GROUP, INC., a California
corporation,
18 Defendant.

Case No.: CV 11-5711 MEJ

**JOINT REQUEST TO EXTEND
DEADLINE FOR MEDIATION;
~~[PROPOSED]~~ ORDER**

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20 On April 30, 2012, Plaintiffs and Defendants filed a Stipulation and [Proposed] Order
21 Selecting Mediation. (Dkt. No. 15). Thereafter, Magistrate Judge Maria-Elena James issued an
22 order on April 30, 2012, requiring the mediation to be completed by July 29, 2012. Docket No.
23 16. On May 22, 2012, the court designated R. Bradford Huss as the Mediator. (Dkt. No. 19).

24 On June 25, 2012, Plaintiffs and Defendants filed a Stipulation and [Proposed] Order,
25 requesting that the mediation completion date be extended to September 27, 2012, (Dkt. No. 20).

26 On June 25, 2012, the court granted the order extending the mediation completion date to
27 September 27, 2012. (Dkt. No 21).

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1 Good cause exists for the current mediation deadline to be extended. Plaintiffs initiated
2 this action to collect unpaid collectively bargained contributions, interest, and liquidated damages
3 owed by the Defendants.

4 The parties have diligently been conducting audits of five sites at issue.

5 The audit has been completed as to three of the five sites. However, two sites are still in
6 the audit process.

7 In addition, the plaintiffs have recently discovered a sixth site for which an audit is
8 required that was previously unknown to plaintiffs.

9 By gross summary, the parties do not have final audit numbers from the plaintiffs for
10 consideration and review by the defendant. The parties anticipate having "final" audit numbers
11 within the next thirty to forty-five days.

12 Mediator R. Bradford Huss has agreed to such extension. The parties and the mediator
13 have exchanged proposed mediation dates in November.

14 Accordingly, the parties respectfully request that the Court extend the deadline to complete
15 the mediation an additional 60 days until November 30, 2012.

16 Dated: September 21, 2012

SALTZMAN & JOHNSON LAW CORPORATION

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18 By: /s/ KIMBERLY A. HANCOCK
19 Kimberly A. Hancock
20 Attorneys for Plaintiff

21 Dated: September 21, 2012

LAW OFFICES OF A. JAY NORTON

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23 By: /s/AURA J. NORTON, III
24 Aura J. Norton, III
25 Attorneys for Defendants
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1 IT IS SO ORDERED.

2 Based on the foregoing, and good cause appearing, the parties shall complete the mediation
3 by November 30, 2012.

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5 Date: September 24, 2012



6 MARIA-ELENA JAMES
7 United States Magistrate Judge
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